

LAWYERS

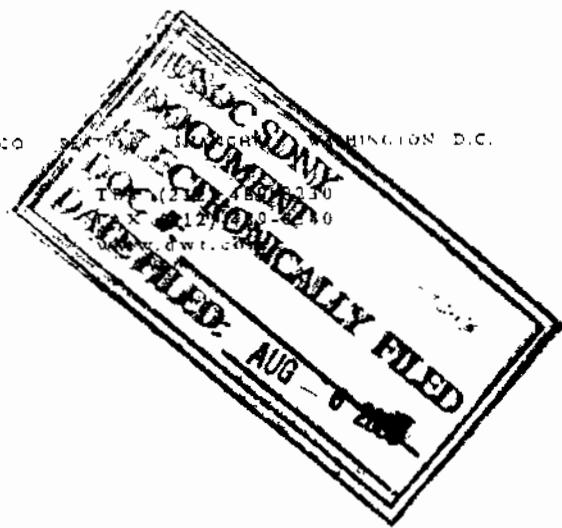
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August 5, 2008



**VIA FACSIMILE**  
**(212) 805-6737**

Hon. George B. Daniels  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 630  
New York, NY 10007

Re: *Muinoss v. Thomas Nelson, Inc.*  
Index No 00271/08

08cv271

Dear Judge Daniels:

We represent the defendant in the above-referenced matter. We write on behalf of all parties to request an adjournment of the pretrial conference scheduled for August 6, 2008 as well as an adjournment of certain other dates in the Civil Case Management Plan and Scheduling Order for this case.

Per Your Honor's rules, the parties wish to extend discovery by 60 days in order to allow for additional document collection and out-of-state depositions. Accordingly, the parties do not feel that a pretrial conference would be productive at this time, and request that it be adjourned to October 8, 2008.

The parties request the adjournments of the dates listed in the Civil Case Management Plan and Scheduling Order as follows:

- All discovery shall be commenced in time to be completed by **October 6, 2008**.
- Dispositive motions are to be served by **December 1, 2008**.
- Final pretrial conference will be held on **January 7, 2009** (or four (4) weeks from the decision on any dispositive motion)

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- The Joint Pretrial Order shall be filed no later than December 8, 2008.
- The parties shall be ready for trial on 48 hours notice on or after January 7, 2009.
- The Next Case Management Conference will be held on October 8, 2008 at 9:30 a.m.

The parties have consulted and request all of the above dates jointly.

Thank you very much for your consideration.

Very truly yours,



Kevan Choset

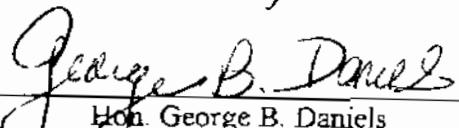
Enclosures

cc: Andrew Vitrano, Esq

IT IS SO ORDERED

This 6<sup>th</sup> day of August, 2008

AUG 6 2008

  
Hon. George B. Daniels  
U.S.D.J.  
**HON. GEORGE B. DANIELS**